

September 20, 2004

Craig Dickerson, Program Manager  
Financial Assistance Programs Division  
Natural Resources Conservation Service  
P.O. Box 2890  
Washington, DC 20013-2890

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SEP 29 2004

Re: Conservation Security Program (CSP)

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Dear Mr. Dickerson,

My name is Benjamin Eldredge and I am representing the Pipe Creek Ranch located in the Texas hill country just 50 miles from San Antonio, Texas. It has recently come to my attention that there is an interim rule proposed for the Conservation Security Program that "is so restrictive and biased that the program's purpose and goals, and the intent of the law, are at risk."

At the Pipe Creek Ranch we research and work diligently to provide the absolute best land stewardship that our finances allow. Unfortunately, our finances do not allow enough.

Ranching is an economically challenging business with boom and bust cycles in the livestock markets that make profit earning difficult and often impossible, especially when factoring in the cost of maintaining a herd and the ranch infrastructure.

On a ranch, agricultural and environmental value is tied to the quality and quantity of its grasses. Proper management of these grasses is accomplished through herd rotation practices that require adequate fencing and water distribution, and the eradication of aggressive, unpalatable species of plant like the Ashe Juniper "cedar."

Like so many properties in this region of Texas, ours requires extensive and costly efforts to control the overgrowth of cedar and ensure the proper management of grasses. Despite our prolonged efforts to deal with our cedar problems, over half of our property is covered with cedar that is too large to be controlled using prescribed burns. From a cost benefit standpoint the cost of eradicating the large cedar on our property is so high as to be prohibitive. We have therefore eagerly anticipated our chance to apply for CSP funds to help us reclaim the grasslands that have been over-run by this aggressive, moisture squandering plant.

While the average business mind might dismiss this concern as being comparable to the concerns of any business, a cost-benefit assessment of the value of cedar eradication prove positive when we look at the benefits accrued beyond the border of this and other ranches. Our ranch contributes to the process of seepage and water flow that recharges the Edwards Aquifer. Cedar squanders this water due to a lack of stomata to control the release of moisture from its leafy tissue, thus it acts like a water wick, removing water from the soil and streams and evaporating it into the atmosphere, virtually unused.

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Additionally, by choking out the grasses, the cedar reduces the number of available avenues for water to seep. As any hydrologist can attest, the primary route through which water penetrates into the soil and subsequent substrata is through flow down along the roots of grasses that grow several feet into the soil. Therefore, as long as cedar dominates the landscape, the rate of aquifer recharge is severely diminished, creating water shortage problems for our cities and our farms. By understanding this process, any economist comes to respect that the financial value of well-managed property is inestimable.

Keeping in mind the explanation I have provided, I hope that you will lend your consideration to the following statements and back the argument that they express with your efforts:

The Conservation Security Program (CSP) is an important and innovative step forward in our nation's approach to conservation and a critical new component of U.S. farm policy. CSP holds great promise for rewarding ranchers based on how they protect and improve the environment. As intended by Congress, CSP should be a nationwide program available to all types of producers, in all regions of the country, with all types of conservation objectives.

Conservation ranchers provide many essential benefits to all Americans in the form of clean air, clean water, habitat and soil protection, and more. The CSP should recognize and reward actual conservation benefits produced by ranchers on their ranch and provide incentives for farmers to address and solve critical resource problems. As stated by the NRCS, "In short, CSP should reward the best and motivate the rest."

I urge you to ensure that CSP fulfills its promise. The following points are essential for CSP regulations to ensure implementation of CSP's legislative intent:

1. Remove restrictions that now limit enrollment to only a few watersheds and certain "categories" of farmers and ranchers. CSP should be nationwide, without geographical restrictions. Participation in CSP should not be limited to particular watersheds.
2. Expand eligible resource concerns to all types of conservation objectives. Participation in CSP should include farmers and ranchers in all types of agriculture who are willing to commit to significant conservation practices. It should not be restricted to particular categories and subcategories of farmers and ranchers.
3. Eliminate the new "per acre" cap on contract payments. It favors large farms over small farms and those with high land rents over those with lower rental rates even if those farms may be practicing less conservation.
4. Expand enhancement payments to include the full range of options in the law, including crop rotations, rotational grazing, buffers, energy conservation, conservation and regeneration of plant and animal germplasm, environmentally sound management of invasive species, agro forestry practices, native prairie restoration, pollinator protection and enhancement, continued enhancement payments for on-farm/ranch research and demonstration activities and for on-farm/ranch assessment and evaluation activities.

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5. Increase the cost-share rate for new practices.
6. Remove requirements for a prior history of meeting high environmental standards, and instead require that high standards be met in a reasonable time after participating in the CSP.

The CSP has not only the potential, but also the imperative, to provide farmers and ranchers with meaningful incentives and rewards for implementing comprehensive protection of the nation's extremely valuable, natural resources.

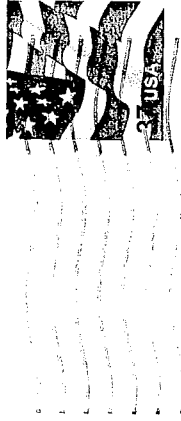
Thank you for this opportunity to comment on this very important program.

Sincerely,

Benjamin Eldredge

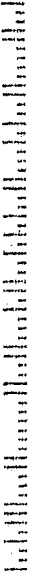
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